

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re Century 21 Department Stores, LLC
Fair and Accurate Credit Transactions
Act (FACTA) Litigation

MDL Docket No. 2352
ALL CASES

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**SUGGESTIONS OF PLAINTIFF YAAKOV KATZ FOR ITEMS TO BE
INCLUDED IN AGENDA FOR INITIAL PRETRIAL CONFERENCE**

Pursuant to the Court's Practice and Procedure Order of June 13, 2012, Plaintiff Yaakov Katz suggests the following agenda items for the initial pretrial conference scheduled on September 24, 2012 in this matter:

1. Whether a consolidated complaint should be filed;
2. Procedures for the exchange of existing discovery;
3. Discussion of what further discovery is needed;
4. Order of discovery, i.e. whether discovery on class issues and discovery on the merits of the case should be bifurcated;

Respectfully Submitted,

s/Shimshon Wexler
Shimshon Wexler

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CERTIFICATE OF SERVICE

I, Shimshon Wexler, hereby certify that on July 30, 2012, a true and accurate copy of the foregoing document was filed via the Court's CM/ECF system. Notification of such filing was sent to the following parties:

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